



Phase I Environmental Site Assessment

Nye Regional Medical Center

**825 South Main Street
Tonopah, Nevada 89049**

**Nye County
Assessor Parcel Number 008-261-56**

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STANDARD ACRONYMS

ACBM	Asbestos Containing Building Material
ACM(s)	Asbestos Containing Materials
APN	Assessor's Parcel Number
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
AUL	Activity and Use Limitation
BER	Business Environmental Risk
bgs	Below Ground Surface
CEM	Certified Environmental Manager
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
CORRACTS	Corrective Actions
CREC	Controlled Recognized Environmental Condition
DRI	Desert Research Institute
ECHO	Enforcement and Compliance History Online
EDR	Environmental Data Resources, Inc.
EPA	United States Environmental Protection Agency
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
GIS	Geographic Information Systems
HREC	Historical Recognized Environmental Condition
HUD	United States Department of Housing and Urban Development
LBP	Lead Based Paint
LUST	Leaking Underground Storage Tank
NDEP	Nevada Division of Environmental Protection
NDWR	Nevada Division of Water Resources
NFRAP	No Further Remedial Action Planned
NPL	National Priority List
RCRA	Resource Conservation and Recovery Act
RDSBC	Rural Desert Southwest Brownfields Coalition
REC	Recognized Environmental Condition
SEMS	Superfund Enterprise Management System
SHWS	State Hazardous Waste Site
TPH	Total Petroleum Hydrocarbons
TSD	Treatment, Storage, and Disposal
UST	Underground Storage Tank
VEC	Vapor Encroachment Condition
WRCC	Western Regional Climate Center

COMMON UNITS OF MEASURE

sq ft	Square foot
qt	Quart
gal	Gallon
mg/kg	Milligram per kilogram
µg/kg	Microgram per kilogram

mg/L	Milligram per liter
µg/kg	Microgram per liter
pCi/L	Picocuries per liter
ppm	Parts per million
ppb	Parts per billion
cu yd	Cubic yard

EXECUTIVE SUMMARY

BEC Environmental, Inc. (BEC) was retained by the Nevada Division of Environmental Protection (NDEP) Brownfields Program (Client) on behalf of the Northern Nye County Hospital District to perform a Phase I Environmental Site Assessment (ESA) of the Nye Regional Medical Center property, located on Nye Assessor's Parcel Number (APN) 008-261-56. The NDEP Brownfields Program is funded by a U.S. Environmental Protection Agency (EPA) 128(a) Brownfields Program Grant. The purpose of the Phase I ESA was to identify, to the extent feasible, recognized environmental conditions (RECs) in connection with the subject site. BEC performed the site reconnaissance on September 20, 2019. It should be acknowledged details were not included or fully developed in this section, and the report must be read in its entirety for a comprehensive understanding of the items contained herein. In summary, the following items were noted:

- The Nye Regional Medical Center is on a 6.53-acre parcel at 825 South Main Street Tonopah, Nevada 89049.
- Based on a review of the historical documents, including Nye County Assessor, the property is owned by Nye County State of Nevada.
- An initial Phase I ESA was prepared for the subject site by McGinley and Associates (MGA) and dated July 22, 2016 (MGA, 2016). Where practicable, as much of the historic references and information from that report has been incorporated to this report either directly or by reference.
- The main structures on the subject parcel included:
 - The main hospital building, located in the central portion of the subject parcel, constructed in 1971, and 29,158 square feet (sq ft) in size.
 - A records storage building, located northwest of the hospital building, constructed in 1987, and approximately 2,880 sq ft in size.
 - Two metal conex boxes, located immediately south of the records storage building, constructed in 1987, and 320 sq ft in size.
 - One portable generator unit, located immediately south of the conex boxes and approximately 300 sq ft in size.
 - A liquid oxygen tank farm containing one bulk storage tank (approximately 16 ft high) and ten 4-ft cylinders, located southwest of the hospital building, constructed in 1995, and approximately 210 sq ft in size.
 - A maintenance building, located southeast of the liquid oxygen tank farm and south of the hospital building, constructed in 1989, and 1,581 sq ft in size.
 - A mobile home/office trailer located south of the liquid oxygen tank farm and southwest of the maintenance building, constructed in 1991, and approximately 720 sq ft in size.
 - A solar panel array, located south of and adjacent to the mobile home/office trailer, and approximately 8,125 sq ft in size.
 - A liquid propane gas cylinder tank farm containing 10 liquified petroleum gas cylinders, located north of the solar array and southeast of the maintenance building, and approximately 1,600 sq ft in size.
 - The ambulance building, located south of the hospital building and east of the liquid propane gas cylinder tank farm, constructed in 1996, and approximately 2,350 sq ft in size.
 - A biowaste storage building located south of the hospital building and north of the ambulance building, constructed in 2006, and approximately 256 sq ft in size.
 - A shed, formerly used for pumping water to the facility, located southeast of the hospital building and east of the biowaste storage building, and approximately 20 sq ft in size. No groundwater wells were observed on the subject parcel. Based on a review of Nevada

Division of Water Resources' (NDWR) Well Log Database, no water wells were located in the vicinity of the subject site.

- The clinic building, located east of the hospital building, constructed in 1983, and approximately 9,044 sq ft in size.
- A solar panel array, located southeast of the clinic building, and approximately 1,350 sq ft in size.
- Based on reviews of topography maps for the area, the parcel ranges in elevation from approximately 6,140 to 6,160 ft above mean sea level. Based on site observations, the highest elevation of the parcel is along the southern boundary. The southernmost solar array, mobile home/office structure, LPG tanks, and ambulance building are at the highest points on the parcel. The records storage building, conex boxes, mobile generator, hospital building, liquid oxygen tank farm, and clinic building, as well as the associated asphalt parking lot for these structures, are located at the lowest elevation on the parcel.
- The regulatory database report was purchased through Environmental Data Resources, Inc. (EDR) and the review of the report identified the following:
 - The regulatory database review identified the subject property in the State and tribal-equivalent Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database as a State Hazardous Waste Site (SHWS) and in the State's registered Underground Storage Tank (UST) list.
 - The regulatory database review identified one Resource Conservation Recovery Act (RCRA) Small Quantity Generator site; one Superfund Enterprise Management System (SEMS)-Archive site; 8 state and tribal-equivalent CERCLIS database as a SHWS (including the subject site); two State registered UST sites (including the subject site); 3 Brownfield sites (excluding the subject site); and one former landfill/solid waste disposal site within their respective search radii from the subject site.
- Based on BEC's review of the EDR regulatory database report for the site and the previous Phase I ESA's findings, the following constitute HRECs for the site:
 - In May 1995, Nye County abandoned a 500-gallon diesel tank associated with the biowaste storage building/incinerator on the subject property by filling the UST with sand. Nye County obtained two soil samples from either end of the UST for laboratory analysis. Laboratory analytical results reported both samples contained total petroleum hydrocarbons (TPH) concentrations below the 10 milligram per kilogram (mg/kg) detection limit. Based on this information, NDEP closed the case file on February 25, 1997.
 - In 1999, Nye County abandoned a 10,000-gallon heating oil tank in place after collecting soil samples for laboratory analysis for TPH. The laboratory analytical results reported TPH concentration from both samples as 25 mg/kg, below the State Action Level of 100 mg/kg TPH. Based on the laboratory analytical data, NDEP closed the case file on February 3, 1999.

BEC has performed a Phase I ESA in conformance with the scope and limitations of American Society of Testing and Materials (ASTM) Standard E 1527-13 for the subject site located at 825 South Main Street, Tonopah, Nevada on APN 008-261-56. Any exceptions to, or deletions from, this practice are described in Section 1.3 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the subject site except the following:

- Based on BEC's review of the EDR regulatory database report for the site and the previous Phase I ESA's findings, the following constitutes a Controlled Recognized Environmental Condition (CREC) for the subject site:

- After removal of a 750-gallon UST, two soil samples were collected from either end of the former UST location for laboratory analysis. Laboratory analytical results reported both samples exceeded the detection limit for TPH and one reported a TPH concentration of 176 mg/kg (above the State Action Level of 100 mg/kg). A request for administrative closure based on an A through K site evaluation in accordance with conditions outlined in Nevada Administrative Code (NAC) 459.9973, Sections 1(a) through 1(k). NDEP concurred with the request based on the site evaluation and closed the case file in February 1999. Based on the remaining TPH in soil at the subject site, BEC (consistent with MGA's previous report) considers this CREC to be a REC for the subject property.
- Based on BEC's observations made during the site visit, BEC considers the following conditions to constitute RECs for the site:
 - During the site visit conducted for the Phase I ESA, BEC (consistent with MGA's findings from the earlier Phase I ESA) observed the presence of remnant diesel fuel piping associated with one of the previously abandoned USTs at the subject property. This suspicion was based on observation of two possible diesel supply pipes protruding from the concrete floor within the generator shed and one suspected vertical vent pipe observed along the exterior wall of the generator shed adjacent to the main hospital building.
 - During observations made throughout BEC's site visit and in MGA's Phase I ESA report, floor drains were noted in the laboratory, boiler room, and ambulance building. The active and historic use of hazardous materials in the vicinity of these drains was also noted in each of these areas. It should be noted that the use of silver bromide to develop x-ray films may be a contributing factor to heavy metals in floor drains and their associated plumbing traps. Additionally, MGA noted the possible existence of a sand/oil separator near the ambulance building but did not note a similar feature for the floor drains in the main hospital buildings. BEC considers the existence of plumbing traps and sand/oil separator structures to constitute a REC warranting investigation of these structures for petroleum products, heavy metals, and other hazardous materials.
- Based on the findings of the MGA Hazardous Building Materials report, BEC considered Asbestos Containing Materials (ACMs) and Lead-Based Paint (LBP) to be a Business Environmental Risk (BER) for the subject site.

It is the opinion of BEC the identified conditions above warrant additional investigation.

1 INTRODUCTION

BEC was retained by the Nevada Division of Environmental Protection (NDEP), on behalf of the Northern Nye County Hospital District to perform a Phase I ESA of the Nye Regional Medical Center property, located on Assessor's Parcel Number (APN) 008-261-56. According to the Nye Assessor, the property is comprised of a 6.53-acre parcel. The list of assessed real property improvements on the parcel includes, but is not limited to the following:

- A 29,158 sq ft hospital building
- A 9,044 sq ft clinic building
- A 2,345 sq ft ambulance services building
- Two 320 sq ft conex boxes
- A 256 sq ft bio building
- A 1,581 sq ft maintenance building

Additional information regarding the major structures on the property is provided in Section 5 of this report.

The location of the Nye Regional Medical Center property is shown in the Vicinity Map and the Assessor's Parcel Map (**Attachment 1, Figure 1** and **Figure 2**, respectively), and hereinafter referenced as the subject site. The subject site is located north of the Tonopah Senior Center, east of the Nevada Department of Transportation's Maintenance Facility, south of US Highway 95, and west of an adjacent, undeveloped parcel in Tonopah, Nevada, as depicted in the Area Reconnaissance Map (**Attachment 1, Figure 3**). The following sections identify the purpose, detailed scope of services, significant assumptions, limitations and exceptions, and user reliance information relevant to the preparation of this Phase I ESA report.

1.1 Purpose

The purpose of this Phase I ESA was to identify any Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), Historical Recognized Environmental Conditions (HRECs), and/or Business Environmental Risks (BERs) that may be present due to past or present land use of the subject site and/or properties in the subject site vicinity, defined by ASTM Standard E 1527-13, *Standard Practice for Phase I Environmental Site Assessment* as follows:

Recognized Environmental Condition (REC) means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.

A Controlled Recognized Environmental Condition (CREC) [is defined as] a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

An Historical Recognized Environmental Condition (HREC) [is defined as] a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting

unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

A Business Environmental Risk (BER) [is defined as] a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use a parcel of commercial real estate.

This Phase I ESA reviewed the potential for Vapor Encroachment Conditions (VECs) that may be present due to past or present land use of the subject site and/or properties in the subject site vicinity. VECs are defined by ASTM Standard E 2600-15, *Vapor Encroachment Screening on Property Involved in Real Estate Transactions*, as the presence or likely presence of Chemicals of Concern that may migrate as vapors into the vadose zone (the area between the ground surface and the water table, in which vapors may migrate) of a property as a result of contaminated soil and/or groundwater on or near the property.

During the course of this assessment, specific existing, potential, or suspect conditions were evaluated that may pose an environmental liability with respect to hazardous substances and/or petroleum products for the current owner, future owners, or operators at the subject site (ASTM, 2013).

1.2 Scope of Work

The scope of work in performing this Phase I ESA included four main tasks: a regulatory records review, site reconnaissance, personal interviews, and report preparation.

BEC reviewed readily available records from Nye County and the regulatory compliance files of the EDR Radius Map™ Report with Geocheck® dated September 20, 2019. BEC performed the site reconnaissance on September 20, 2019, to make site observations of the subject parcel and nearby properties. BEC interviewed the site owner, manager, and user between September 25 and September 26, 2019, to obtain additional current or historic site use information (**Attachment 2 – Interview Documentation**). Based on the recent nature of the Phase I ESA report prepared by MGA in 2016 and the lack of additional corrective action cases opened since the previous Phase I ESA by NDEP in the vicinity of the subject site, BEC found insufficient information to warrant a regulatory compliance file review at NDEP's offices. BEC reviewed additional files forwarded by Nye County's Assistant County Manager and Public Information Officer from County records on September 30, 2019. BEC conducted reviews of Nye County Assessor's Office and Recorder's Office websites on October 10 through 14, 2019. This report comprises the fourth and final task of the Phase I ESA process.

1.3 Limitations and Exceptions

The scope of this evaluation did not include: subsurface exploration, soil or water sampling, chemical analysis, or an evaluation of asbestos, biological agents, cultural and historic resources, ecological resources, endangered species, health and safety, indoor air quality (unrelated to releases of hazardous substances or petroleum products into the environment), industrial hygiene, lead, mold, radon, regulatory compliance, or wetlands. Properties surrounding the site were visually inspected from public rights-of-way or fence lines. Our observations were made from readily accessible vantage points. Although a reasonable effort was made to view relevant site features, some features may have been concealed from view.

While this report provides an overview of potential environmental concerns, both past and present, the environmental assessment is limited by the availability of information at the time of the assessment. It is possible unreported disposal of waste or illegal activities impairing the environmental status of the property may have occurred but could not be identified by the assessment. The findings and opinions regarding environmental conditions presented in this report are based on a scope of work authorized by

NDEP. Note, however, no scope of work, no matter how exhaustive, can identify all contaminants or all conditions above and below ground.

1.4 Significant Assumptions

BEC used the services of a computer database firm to provide a listing of sites within the ASTM standard search distance around the site. BEC assumed the information in this report was accurate unless conflicting information was obtained from credible sources or field observations made by BEC's environmental professional(s) during the site reconnaissance indicated otherwise. Deviations are subsequently noted in this report.

Information regarding the subject site was reasonably ascertainable. Therefore, no other significant assumptions have been made in this report.

1.5 Special Terms and Conditions

The findings, opinions, and conclusions are based on an analysis of the observed site conditions and the referenced literature. It should be understood the conditions of a site can change with time as a result of natural processes or the activities of man at the subject site or within the site vicinity. Additionally, changes to the applicable laws, regulations, codes, and standards of practice may occur due to government action or the broadening of knowledge. The findings of this report may, therefore, be invalidated over time, in part or in whole, by changes over which neither NDEP nor BEC has any control. Neither NDEP nor BEC can warrant or guarantee that not finding indicators of any particular hazardous material means that this particular hazardous material or any other hazardous materials do not exist on the site. Additional research, including invasive testing, can reduce the uncertainty, but no techniques now commonly employed can eliminate the uncertainty altogether.

The environmental services described in this report have been conducted in general accordance with current regulatory guidelines and the standard of care exercised by environmental consultants performing similar work in the State of Nevada. No other warranty, expressed or implied, is made regarding the professional opinions presented in this report. This document is intended to be used in its entirety. No portion of the document, by itself, is designed to completely represent any aspect of the project described herein. NDEP or BEC should be contacted if the reader requires any additional information or has questions regarding the content, interpretations presented, or completeness of this document.

1.6 User Reliance

This report may be relied upon and is intended exclusively for use by NDEP and their assigns for the purposes stated within a reasonable time from issuance, but in no event later than 180 days from the date of the report. Land or facility use, on- and off-site conditions, regulations, or other factors may change over time, and additional work may be required with the passage of time. Since site activities and regulations beyond our control could change at any time after the completion of this report, our observations, findings, and opinions can be considered valid only as of the date of the site visit. This report should not be relied upon after 180 days from the date of its issuance (ASTM Standard). Any use or reuse of the findings, opinions, and/or conclusions of this report by parties' other than NDEP is undertaken at said parties' sole risk.

2 SITE DESCRIPTION

This section provides an overview of the subject site, as well as detailed information regarding site location, land use and zoning information, a description of the local and regional hydrogeological characteristics of the subject site, a list of structures and other improvements, and a general description of

adjoining properties. Information regarding the current use of the site and adjoining properties was obtained during records research, site reconnaissance, and personal interviews.

2.1 Location and Site Description

The subject site is located on one 6.53-acre parcel in Tonopah, Nevada, on Nye County APN 008-261-56. The subject site address is 825 South Main Street in Tonopah, Nevada. The subject site is located in the West ½ of the Northwest ¼ of Section 1 and the East ½ of the Northeast ¼ of Section 2, Township 2 North, Range 42 East, of the Mount Diablo Baseline and Meridian.

Reference the Vicinity Map (**Attachment 1, Figure 1**) and the Assessor's Parcel Map (**Attachment 1, Figure 2**) for the location of the subject parcel addressed for the purposes of this study. The Area Reconnaissance Map (**Attachment 1, Figure 3**) depicts observations of adjoining and nearby properties. The Site Reconnaissance Map (**Attachment 1, Figure 4**) depicts observations within the subject site. The Federal Emergency Management Agency (FEMA) Flood Zone Map (**Attachment 1, Figure 5**) depicts the location of the subject site predominantly within an Area of Minimal Flood Hazard. The northeast boundary of the subject site is within a Special Flood Hazard Area Zone A, without base flood elevation determined.

Based on information obtained from the Nye County Assessor's Office, the subject site includes several real property and personal property structures for commercial use in supporting the former Nye Regional Medical Center (**Attachment 3 – Local and Regulatory Records**). The subject site is located in a mixed-use neighborhood. According to the Nye County Assessor's Office, the land use for the subject site is zoned as 400- General Commercial. Structures on the parcel include the following:

- The main hospital building, located in the central portion of the subject parcel, constructed in 1971, and 29,158 square feet (sq ft) in size.
- A records storage building, located northwest of the hospital building, constructed in 1987, and approximately 2,880 sq ft in size.
- Two metal conex boxes, located immediately south of the records storage building, constructed in 1987, and 320 sq ft in size.
- One portable generator unit, located immediately south of the conex boxes and approximately 300 sq ft in size.
- A liquid oxygen tank farm containing one bulk storage tank (approximately 16 ft high) and ten 4-ft cylinders, located southwest of the hospital building, constructed in 1995, and approximately 210 sq ft in size.
- A maintenance building, located southeast of the liquid oxygen tank farm and south of the hospital building, constructed in 1989, and 1,581 sq ft in size.
- A mobile home/office trailer located south of the liquid oxygen tank farm and southwest of the maintenance building, constructed in 1991, and approximately 720 sq ft in size.
- A solar panel array, located south of and adjacent to the mobile home/office trailer, and approximately 8,125 sq ft in size.
- A liquid propane gas cylinder tank farm containing 10 liquified petroleum gas cylinders, located north of the solar array and southeast of the maintenance building, and approximately 1,600 sq ft in size.
- The ambulance building, located south of the hospital building and east of the liquid propane gas cylinder tank farm, constructed in 1996, and approximately 2,350 sq ft in size.
- A biowaste storage building located south of the hospital building and north of the ambulance building, constructed in 2006, and approximately 256 sq ft in size.
- A shed, formerly used for pumping water to the facility, located southeast of the hospital building and east of the biowaste storage building, and approximately 20 sq ft in size.

- The clinic building, located east of the hospital building, constructed in 1983, and approximately 9,044 sq ft in size.
- A solar panel array, located southeast of the clinic building, and approximately 1,350 sq ft in size.

The former Nye Regional Medical Center was used as a hospital facility and supporting structures. However, after the facility closed in 2015, Renown Healthcare was contracted by Nye County to provide medical services at the clinic building on the eastern portion of the property. Current use of the property is restricted to the clinic building, but some of the equipment and supplies stored in the hospital building are also used by clinic staff.

Utility services currently available on the subject parcel include power, water, sewer, and communications. Electricity services are provided by NV Energy and are supplemented by two solar arrays. Tonopah Public Utilities provides water and sanitary sewer services. Liquid propane gas is delivered to the LPG tank farm by contracted vendors to service the on-site buildings.

2.2 Current Use of Adjoining Properties

The current adjoining property uses are summarized in **Table 2-1**, below, and depicted in **Attachment 1, Figure 3**.

Table 2-1: Subject Site Adjoining Property Overview

Direction	Description
North:	Highway 95, CAL-Nevada Towing shop and tire sales, and Economy Inn Motel.
East:	Vacant lot and Highway 95/Logan Field Road.
South:	Tonopah Senior Center
West:	NDOT Maintenance Facility

2.3 Physical Setting - Topography and Hydrogeology

The subject site is located in Tonopah, Nevada, at the southern end of the San Antonio Mountains in the southwestern part of the Great Basin in the Basin and Range physiographic province (Ferguson & Muller, 1949). These elongated valleys and ranges with a general northeast trend result from block faulting during extensional pull of the region, a fundamental characteristic of the Basin and Range physiographic province. However, the close association with the Walker-Lane transitional zone may provide additional structure controls on the area beyond the typical extensional regimes of the Basin and Range Province (Busby, 2013). Faulting near the subject parcel is dominantly of tertiary age and strike at roughly the same north-northeast orientation as the San Antonio Mountain range itself (Bonham & Garside, 1979).

Local geology consists mostly of extrusive volcanic rocks of Tertiary age (Bonham & Garside, 1979). The subject site is located between two prominent mountains—Golden Mountain and Mount Butler—composed of large volcanic domes of the Brougher Rhyolite which are surrounded by surficial flows of the Mizpah Formation. Other prominent Tertiary volcanic units include the Oddie Rhyolite (comprising the entirety of Oddie Mountain), the Heller Tuff, and the ash-flow tuff of the Tonopah Summit Member of the Fraction Tuff. Older volcanics of Cretaceous age are confined to the northern sections of the San Antonio Mountains. While not surficially exposed in the Tonopah area of the San Antonio Mountains, these volcanics are underlain by Paleozoic and Pre-Cambrian age carbonates and siliciclastics representative of a broad coastal environment, including the Wyman, Reed, and Deep Spring Formations; Paleozoic and late Pre-Cambrian strata throughout the region are known to contain exceptionally preserved soft-tissue fossils of early animals (Smith, et al., 2016).

Overlaying the local stratigraphy are small deposits of Quaternary sedimentary deposits, consisting of alluvium shed from the weathering of the surrounding volcanic peaks, and recent mine dumps and

tailings. Ephemeral washes and mass wasting events carry sediments to alluvial fan deposits on the mountain flanks. However, according to the 1968 geologic map by Bonham Jr and Garside, the subject site is located on a small pile of mine tailings from unknown operations (Bonham & Garside, 1979).

The subject site is located within the Death Valley regional ground-water flow system (Belcher, Faunt, & D'Agnesse, 2002) and the Nevada Division of Water Resources has identified this region as the Tonopah Flat subbasin within the Big Smoky Valley basin #137 (Water for Nevada. Report No. 3, 1971). Broadly, groundwater flow comes in from the northeast (basin 141) through the San Antonio range and from the north-northwest through the Big Smoky Valley and discharges predominantly into Clayton Valley basin #143. Hydrologic flow of the area is controlled by the current arid climate and underlying diverse stratigraphy, including a large carbonate unit, the Tertiary age volcanic rocks, the overlying quaternary sedimentary basin fill, and nearby deep and shallow faults.

Northern portions of Nye County experience four seasonal changes with heavy rainstorms prevalent during late spring (May-June) and late summer (August). According to the Western Regional Climate Center northern portions of Nye County experience four seasonal changes with heavy rainstorms prevalent during late spring (May-June) and late summer (August). According to the Western Regional Climate Center (WRCC), Tonopah, Nevada's average maximum and minimum temperatures are 87.4°F and 61.3°F July, and 38.4°F and 22.8°F in January. The average annual precipitation in Tonopah is 4.8 inches (WRCC, 2019). The snowmelt and limited precipitation infiltrate the subsurface through the bedrock and eventually becomes the shallow groundwater aquifer. The depth to groundwater reported in groundwater monitoring wells located down-gradient and to the northwest of the subject parcel ranged from 11 to 26 feet below ground surface (ft bgs). However, these data were collected in 1989, are located at a surface elevation approximately 100 ft below that of the subject parcel and may not be representative of current site conditions (**Attachment 3 – Local and Regulatory Records**). Thus groundwater depth in the immediate vicinity of the subject parcel is anticipated to be more than 100 ft bgs. Local groundwater flow direction is expected flow east to west, sourcing from Ralston Valley basin (#141) as it combines with groundwater flow coming through the Big Smoky Valley (Water for Nevada. Report No. 3, 1971).

The dominant soil composition at land surface in the vicinity of the subject sites was based on information provided by Environmental Data Resources, Inc. (EDR), as supplied from the U.S. Department of Agriculture's Soil Conservation Service. The soil surface is mapped as Pintwater. Soil texture typical of the subject parcel comprises a 14-inch layer of very cobbly fine sandy loam with very slow infiltration rates, overlying unweathered bedrock (EDR, 2019). No natural surface water bodies, including ponds, streams, or other bodies of water, were present on the site at the time of site reconnaissance.

Additional physical setting documentation is provided in **Attachment 4 – EDR Radius Map Report**.

3 USER PROVIDED INFORMATION AND INTERVIEWS

The following section discusses information provided during interviews with persons associated with the subject site and/or its representatives during the course of this study (**Attachment 2 – Interview Documentation**).

3.1 Reason for Performing a Phase I

The Northern Nye County Hospital District requested a Phase I ESA in advance of acquiring the subject site from Nye County to facilitate future medical services in the region.

3.2 Owner, Property Manager, and Occupant Information

The current owner, as recorded in the Nye County Assessor website, is Nye County State of Nevada. Lorina Dellinger, Assistant Nye County Manager, was interviewed as the owner representative for the site. Ms. Dellinger stated Nye County leased a portion of the clinic building on the subject parcel to Renown Health to ensure some level of medical services were available to the residents of Tonopah and the surrounding region.

Sheldon W. Rippie is the Lead Buildings and Grounds Maintenance Worker in Nye County's Tonopah Office. As such, Mr. Rippie completed the Manager questionnaire for the site.

Ms. Jessica Thompson, RN, BSN, Director of Group Practice for Renown Health, completed the User questionnaire for the site, as she supervises Renown Health's activities at the clinic and was a former employee of the Nye Regional Medical Center.

3.3 Environmental Liens or Activity and Use Limitations

Based on information provided during interviews with Dellinger, Rippie, and Thompson, no environmental liens or activity and use limitation (AULs) are associated with the subject site (**Attachment 2**). In addition, no environmental liens or AULs were attached to the deed obtained through records review (**Attachment 3**).

3.4 Specialized Knowledge

When queried regarding specialized knowledge concerning the environmental status and potential issues of concern, Dellinger and Rippie stated they had no knowledge of such concerns, but both had been affiliated with the subject parcel for less than four years. Thompson stated she worked for the previous owners of the Nye Regional Medical Center and had working knowledge of the facility for the past approximately 15 years.

3.5 Commonly Known or Reasonably Ascertainable Information

When queried regarding commonly known or reasonably ascertainable information concerning the environmental status and potential issues of concern, Dellinger stated she had no knowledge of chemical spills associated with the property, but was aware of the asbestos in the building. Rippie stated he had no such knowledge. Thompson stated small quantities of cleaning chemicals were located in the building. Additionally, she stated that in approximately 2010, broken pipes caused flood-damage to the interior floors and ceilings. Asbestos associated with that damage had to be abated. She was unfamiliar with any major chemical releases associated with the subject site.

3.6 Valuation Reduction for Environmental Issues

When queried regarding valuation reduction for environmental issues, Dellinger stated the purchase price being paid for the property (no cost-transfer) was not reflective of fair market value for the property, but she also stated the lower price was not associated with the environmental conditions at the property. Rippie stated he believed the purchase price being paid for the property was reflective of the fair market value, and that the price was associated with the environmental contamination associated with the property. Thompson stated she did not know if the price reasonably reflected the fair market value of the property, nor did she know if the cost reflected any contamination known or believed to be present at the property.

4 RECORDS REVIEW

The following sections include results and discussion of the search of local, state, and federal standard record sources.

4.1 Title Records

Ownership records retrieved from the Nye County Assessor’s Office between October 7 and 14, 2019, confirmed Nye County State of Nevada as the current owner of the subject site (**Attachment 3**).

The readily accessible history of ownership information is presented in **Table 4-1**.

Table 4-1: Ownership History

Lot Information	Ownership Information	From	To
APN 008-261-56	Nye County State of Nevada	2016	Present
APN 008-261-56	County of Nye Nevada	2015	2016
APN 008-261-56	Tuna Park, Ltd.	2006	2015

4.2 Environmental Database Search

A search of available federal and state environmental records was obtained from EDR. A copy of the documents provided by EDR can be found in the below referenced attachments:

- **Attachment 3 – Local and Regulatory Records**
- **Attachment 4 – EDR Radius Map Report**
- **Attachment 5 – Historical Map Reports and Imagery Data**

The regulatory database search contained within the EDR Radius Map Report (**Attachment 4**) was reviewed to assess possible RECs within the ASTM approximate minimum search distances. Some records reviewed pertain not only to the property, but also to properties within an additional approximate minimum search distance in order to help assess the likelihood of migrating hazardous substances or petroleum products.

Although numerous databases were searched during the preparation of this report, those required under the ASTM E 1527-13 and the ASTM E 2600-15 (ASTM, 2015) standards have been selected for discussion. The required databases, database update information, and search distances, as well as the number of sites identified within the associated search radii are summarized in **Table 4-2** and **Table 4-3**.

Table 4-2: Federal Environmental Records

Record Source	ASTM Search Distance	EDR Search Distance	Within Subject Site	Within Search Radii	REC Identified
National Priorities List (NPL) Facilities	1.0	1.0	0	0	No
Delisted NPL Facilities	0.5	1.0	0	0	No
Superfund Enterprise Management System (SEMS) Facilities [formerly Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Facilities]	0.5	0.5	0	0	No

Record Source	ASTM Search Distance	EDR Search Distance	Within Subject Site	Within Search Radii	REC Identified
SEMS - Archive [formerly CERCLIS No Further Remedial Action Planned (NFRAP) Facilities]	0.5	0.5	0	1	No
Resource Conservation and Recovery Act (RCRA), Corrective Actions (CORRACTS) Treatment, Storage, and Disposal (TSD Facilities)	1.0	1.0	0	0	No
RCRA Non-CORRACTS TSD Facilities	0.5	0.5	0	0	No
RCRA Non-Generators	Property and Adjoining	0.25	0	0	No
RCRA Large Quantity Generators	Property and Adjoining	0.25	0	0	No
RCRA Small Quantity Generators	Property and Adjoining	0.25	0	1	No
RCRA Conditionally Exempt Quantity Generators	Property and Adjoining	0.25	0	0	No
Federal Institutional/Engineering Control Registries	Property Only	0.5	0	0	No
Federal Emergency Response Notification System (ERNS) List	Property Only	Property Only	0	0	No

Table 4-3: State Environmental Records

Record Source	ASTM Search Distance	EDR Search Distance	Within Subject Site	Within Search Radii	REC Identified
Equivalent NPL Facilities	1.0	1.0	0	0	No
Equivalent SEMS-CERCLIS Facilities [State Hazardous Waste Site (SHWS)]	0.5	1.0	1	8	Yes
Leaking Underground Storage Tanks (LUST)	0.5	0.5	0	0	No
Registered Underground Storage Tanks (UST)	Property and Adjoining	0.25	1	2	No
Registered Above Ground Storage Tanks (AST)	Property and Adjoining	0.25	0	0	No
Institutional/Engineering Control	Property Only	0.5			No
Voluntary Cleanup Sites	0.5	0.5	0	0	No
Brownfield Sites (State and Local Records)	0.5	0.5	0	3	No

Record Source	ASTM Search Distance	EDR Search Distance	Within Subject Site	Within Search Radii	REC Identified
Landfill/Solid Waste Disposal Sites	0.5	0.5	0	1	No
Landfill/Solid Waste Disposal Recycling Facilities	0.5	0.5			No
Landfill Open Dump Inventory	0.5	0.5	0	0	No

United States EPA, NPL

The EPA NPL database comprises confirmed or proposed hazardous waste sites targeted for possible long-term remedial action under the Superfund Program. Neither the subject site nor facilities/properties within a 1-mile radius of the subject site were listed.

United States EPA, Delisted NPL

The EPA Delisted NPL database is a subset of the NPL. Neither the subject site nor facilities within a 1-mile radius of the site were listed.

United States EPA, SEMS (formerly the CERCLIS List)

The SEMS (formerly CERCLIS) list is an EPA list of sites that are either proposed for or are on the NPL and sites that are in the screening and assessment phase for possible inclusion on the NPL. CERCLIS was renamed to SEMS by the EPA in 2015. Facilities identified by the EPA, which may have the potential for releasing hazardous substances into the environment are provided in the SEMS facilities list. Neither the subject site nor facilities within a 0.5-mile radius of the site were listed.

United States EPA SEMS- Archive (formerly CERCLIS-NFRAP)

The SEMS-Archive tracks sites that have no further Federal Superfund Program remedial actions based on available information. CERCLIS-NFRAP was renamed SEMS-Archive by the EPA in 2015. The SEMS-Archive list is an EPA database of former SEMS sites where no further remedial action is planned under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). SEMS-Archive sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration.

The EDR Radius Map Report identified one site within a 0.5-mile radius of the subject site.

Mineop Corp Johnson Mine, Site ID 0902958, was located 0.421 miles north-northwest of the subject site at 459 Mizpah Circle. Based on the distance and hydrologically down-gradient location from the subject site, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

United States EPA, RCRA, CORRACTS List

This list is a database of facilities subject to corrective action under RCRA. The list generally identifies EPA-listed facilities that have reported a release of hazardous waste or constituents into the environment and are undergoing corrective action. Corrective action may be required beyond the facility's boundary and can be required regardless of when the release occurred. Neither the subject site nor facilities within a 1-mile radius of the site were listed.

United States EPA, RCRA non-CORRACTS, TSD Facilities List

This database identifies EPA-listed facilities which report storage, treatment, and/or disposal of hazardous waste under the EPA's RCRA program. Neither the subject site nor facilities within a 0.5-mile radius of the site were listed.

United States EPA, RCRA Non-Generators List

This database identifies EPA-listed facilities which may store or transport hazardous waste or meet other RCRA requirements but do not generate hazardous waste. Neither the subject site nor facilities within a 0.25-mile radius of the site were listed.

United States EPA, RCRA Generators List

This database identifies EPA-listed facilities which generate or transport hazardous waste or meet other RCRA requirements. The types of facilities within this database include: Large Quantity Generators, Small Quantity Generators, and Conditionally Exempt Generators.

The EDR Radius Map Report identified one site within a 0.5-mile radius of the subject site.

Nevada Department of Transportation (DOT) Maintenance Station, EPA Identification Number NVD982444036, was located 0.103 miles northwest of the subject site at 805 Erie Main Street. The EDR radius report stated the NDOT facility was cited for an on-site Compliance Evaluation Inspection violation on September 26, 1996. Although no details regarding the violation were reported, the record indicated the site achieved compliance on December 2, 1996. Additionally, further evaluation of the site through the EPA's Enforcement and Compliance History Online (ECHO) database showed that as of the most recent Compliance Evaluation Inspection conducted on June 14, 2017, no violations were identified at this site. Based on the information provided in the EPA's ECHO database, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

Federal Institutional Control/Engineering Control Registries

These registries comprise information obtained from two main sources. The first source, the Brownfield Management System, is a database designed to assist the EPA in collecting, tracking, and updating information relevant to federal, state, and local Brownfield programs. The Small Business Liability Relief and Brownfields Revitalization Act ("Brownfields Law," Public Law 107-118) defines a brownfield site as "real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant," as defined in CERCLA. The second source is a database of Superfund sites that have either an engineering or institutional control. Neither the subject site nor facilities within a 0.5-mile radius of the site were listed.

Federal ERNS List

This list comprises a database of emergency response actions and may include reported CERCLA hazardous substance releases or spills in quantities greater than the reportable quantity, as maintained at the National Response Center. Data since January 2001 has been received from the National Response System database as EPA no longer maintains this data. The subject site was not listed.

State/Tribal Equivalent NPL: NDEP, Superfund Branch

The EPA NPL database comprises confirmed or proposed hazardous waste sites targeted for possible long-term remedial action under the Superfund Program. In Nevada, state equivalent NPL Facilities and/or sites are designed and overseen by NDEP, Bureau of Corrective Actions, Superfund Branch. Neither the subject site nor facilities within a 1-mile radius of the site were listed.

State/Tribal Equivalent SEMS (formerly CERCLIS): NDEP Bureau of Corrective Actions, SHWS List

The NDEP Bureau of Correction Actions maintains a list and oversees cleanup of releases of regulated substances.

The EDR Radius Map Report identified eight sites within a 1.0-mile radius of the subject site, including the subject site. Specific case details are discussed below, and the sites are summarized in **Table 4-4**, below.

The Nye Regional Medical Center, also referenced herein as the subject site, is identified in the NDEP system as Facility ID 7-000094. NDEP case file records indicate two reported releases. The first record indicated a reported release on January 1, 1990. The records indicated no impact to media and provided no description of the event, but gave a closure date of February 25, 1997. The second record indicated a release of diesel fuel to soil on December 3, 1998, and an associated administrative closure February 3, 1999. Additional information regarding these releases and additional information obtained through NDEP case file reviews by MGA during their Phase I ESA is provided in Section 4.4 of this report.

Nevada Department of Transportation, Facility ID 7-000077, was located 0.103 miles northwest of the subject site at 805 Erie Main Street. NDEP case file records indicated two releases to soil of an unspecified product associated with an underground storage tank. The releases were closed on February 5, 1992, and on December 7, 1995, respectively. Based on the case file status and downgradient location, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

Tonopah Shell, Facility ID 7-000015, was located 0.336 miles northwest and downgradient of the subject site at 459 Erie Main Street. Two spills to soil were reported and were closed on December 31, 1991, and on November 14, 2000, respectively. Based on the distance and down-gradient location of the site from the subject site, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

Tippin Gas, Facility ID G-001236, was located 0.525 miles northwest of the subject site at 565 North Main Street. One spill of motor oil to soil was reported but was closed as “Clean with Remediation” on September 3, 1997. Based on the distance, down-gradient location, and nature of the spill, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

Alltel Services Corp, Facility ID G-000281, was located 0.567 miles northwest of the subject site at 185 Patrick Street. One spill to soil was reported on August 2, 1995. The case was closed on December 26, 1995, under Nevada Administrative Code (NAC) 459 A-K, meaning limited contamination was allowed to remain in place. Based on the distance, down-gradient location, and nature of the spill, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

Western Energetix, Facility ID 7-000065, was located 0.619 miles northwest of the subject site at 369 North Main Street. One spill to soil was reported to NDEP, and subsequently closed on January 5, 1996. Based on the distance, down-gradient location, and nature of the spill, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

Joe’s Unocal 76 Stat, Facility ID 7-000152, was located 0.705 miles northwest of the subject site at 250 Main Street. The corrective actions case file was reported as a “UST Clean Closure” with no impact to media and was reported closed on October 10, 1996. Based on the distance, down-gradient location, and nature of the case file, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

US Postal Service, Facility ID 7-000083, was located 0.722 miles northwest of the subject site at 201 Main Street. One spill to soil was reported on June 17, 1997, and subsequently reported as closed under regulation NAC 459 A-K on August 14, 1997. Based on the distance, down-gradient location, and nature

of the spill, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

Line items in bold (on the table below) were identified as a REC, CREC, or HREC for the subject site at the time of this report.

Table 4-4 State/Tribal Equivalent SEMS (formerly CERCLIS) Sites

Location Name/Facility ID	Address	Distance/Direction from Site (EDR)	Gradient	Media/Contaminant	Date Closed
Nye Regional Medical Center	825 Erie Main Street	Subject Site	N/A	Soil	February 25, 1997 and February 3, 1999
Nevada Department of Transportation/ 7-000077	805 Erie Main Street	0.103 miles northwest	Down	Soil/Unspecified	December 7, 1995 & February 5, 1992
Tonopah Shell/ 7-000015	459 Erie Main Street	0.336 miles northwest	Down	Soil/Gasoline	November 14, 2000 & December 31, 1991
Tippin Gas/ G-001236	565 North Main Street	0.525 miles northwest	Down	Soil/Motor Oil	September 3, 1997
Alltel Services Corp/ G-000281	185 Patrick Street	0.567 miles northwest	Down	Soil/Heating Oil	December 26, 1995
Western Energetix/ 7-000065	369 North Main Street	0.619 miles northwest	Down	Soil/Unspecified	January 5, 1996
Joe's Unocal/ 7-000152	250 Main Street	0.705 miles northwest	Down	None/Unspecified	October 10, 1996
US Postal Service/ 7-000083	201 Main Street	0.722 miles northwest	Down	Soil/Unspecified	August 14, 1997

State and Tribal Landfill and/or Solid Waste Disposal Site List, SWF/LF: Landfill List

NDEP Bureau of Waste Management, Solid Waste Management Branch, maintains lists of facilities including active solid waste disposal sites, inactive or closed solid waste disposal sites, and transfer facilities. The EDR Radius Map Report identified one site within a 0.5-mile radius of the subject site.

The Tonopah Closed Landfill was located 0.439 miles east-southeast of and cross-gradient to the subject site. Based on the distance and cross-gradient direction of the former landfill from the subject site, this former landfill was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

State/Tribal LUST: NDEP, Bureau of Corrective Actions, LUST List

The LUST Information System is maintained by NDEP, Bureau of Corrective Actions. The Bureau maintains an inventory of sites with leaking underground storage tanks, including sites with tanks under investigation for potential leaks, confirmed leaks, and those to be closed. Neither the subject site nor facilities within a 0.5-mile radius of the site were listed.

State/Tribal UST/AST: NDEP, Bureau of Corrective Actions, UST/AST Registration

This list identifies facilities containing registered USTs and/or ASTs. The EDR Radius Map Report identified both the subject site and one site within a 0.25-mile radius of the subject site as having underground and/or above-ground storage tanks.

The NDOT-Tonopah Maintenance Station, Facility ID 7-000077, located at 805 Erie Street, adjacent to and downgradient of the hospital complex, had three USTs (one 12,000-gallon gasoline UST, one 12,000-gallon diesel UST, and one 750-gallon used oil UST). The used oil UST was reported as closed in 1954 and the other two 12,000-gallon USTs were reported as closed in 1985. Based on down-gradient location

and UST closures, these USTs were not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

A review of the NDEP UST database and information provided in the 2016 Phase I ESA (MGA, 2016) indicated three USTs were previously associated with the subject site, referenced as Facility ID 7-000094, including one 10,000-gallon heating oil tank and one 750-gallon diesel tank (both installed in 1968), and one 500-gallon diesel tank.

The 500-gallon UST was reported abandoned in place by Nye County in 1995, by filling the tank with sand and securing the openings. In response to a request from NDEP, Nye County Public Works submitted a letter dated February 21, 1997, documenting collection of subsurface soil samples from both ends of the tank. The laboratory analytical results from these samples were reported to be less than the laboratory detection limit of 10 mg/kg of TPH. Based on these concentrations, NDEP did not require corrective action measures at the time.

The 750-gallon diesel UST was closed by removal on November 25, 1998, but samples collected from the excavation indicated concentrations of TPH (176 mg/kg) in excess of the action level for TPH of 100 mg/kg. Based on the location and limited impact of the TPH on the soils in the vicinity of the former UST location, NDEP authorized administrative closure (under NAC 459 A-K) for this case.

Two soil borings were performed at either end of the 10,000-gallon UST on December 16, 1998, and submitted for laboratory analysis for TPH. The two samples, both collected at 15 feet bgs, were reported to contain 25 mg/kg of TPH in the oil range. Based on the TPH concentration below the NDEP action limit of 100 mg/kg and the presence of a water line over the top of the UST location, NDEP allowed the UST to be closed in place with no further action required.

Based on the regulatory closures and lab analytical data, these database listings did not appear to constitute a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

State/Tribal Institutional Controls/Engineering Controls/Voluntary Cleanup Sites

Institutional controls (administrative and legal controls) and engineering controls (physical barriers or processes) are designed to minimize the potential for human exposure to contaminants. NDEP provides oversight for the Nevada Voluntary Cleanup Program, which provides relief from liability to owners who undertake cleanups of contaminated properties. Neither the subject site nor facilities within a 0.5-mile radius of the site were listed.

State/Tribal Brownfield Sites

NDEP Bureau of Corrective Actions maintains a list of Brownfield sites as part of its listing of clean-up evaluations and actions regarding sites with actual or potential contamination. The EDR Radius Map Report identified three sites within a 0.5-mile radius of the subject site.

Logan Field Road, Acres Property ID 108561, was located 0.025 miles east-southeast and upgradient of the subject site. This site was originally assessed as a Brownfield property due to its proximity to the hospital and for future use as an assisted living facility to expand the health services associated with the hospital. The Phase I ESA report, prepared by Ninyo and Moore on December 11, 2009, stated “This assessment has revealed no evidence of recognized environmental conditions...” (Ninyo and Moore, 2009). Based on the findings of the Phase I ESA, the Logan Field Road property was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

Air Force Road, Acres Property ID 108542, was located 0.136 miles southeast and upgradient of the subject site. This site was assessed under the Nye County Brownfields Program for potential reuse to

support the Senior Center and/or hospital building. The Phase I ESA report, prepared by Ninyo and Moore on November 24, 2009, identified no recognized environmental conditions for the site. As such, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

Former Military Housing, Acres Property ID 107982, was located 0.149 miles southeast and upgradient of the subject site on Air Force Road. This site was assessed under the Nye County Brownfields Program for potential reuse as area housing. The Phase I ESA report, prepared by Ninyo and Moore on November 30, 2009, found no recognized environmental conditions for the property. As such, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

State/Tribal Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the 40 Code of Federal Regulations (CFR) Part 257 or Part 258 Subtitle D Criteria, which establish revised minimum federal criteria that include location restrictions, facility design and operating criteria, groundwater and landfill gas monitoring requirements, corrective action requirements, financial assurance requirements, and closure and post-closure care requirements. The EDR Report identified no open dump inventory listings within the 0.5-mile search radius.

Orphan Sites

Due to discrepancies in the location of some facilities in the databases arising from incomplete or incorrect addresses, some facilities were listed as un-mappable, otherwise known as “orphan sites”. BEC reviewed the Orphan Summary in the EDR Radius Map Report. The report identified 22 orphan sites. Of these, BEC determined 21 of the sites were located outside the search radius.

Texaco Station #3, located at 1500 Erie Main Street, is approximately 0.5 miles southeast of the subject site. Based on the EDR report, NDEP reported a spill of diesel to soil on November 24, 2011, that was subsequently administratively closed (NAC 445A A-K) on April 3, 2012. Based on the status of the site, limit of contamination to soil, and distance from the subject property, this site was not considered a REC, CREC, HREC, BER, or VEC for the subject site at the time of this report.

4.3 Local Records Documentation

Information regarding the subject site was obtained from the offices of the Nye County Assessor, the Nye County Recorder, and NDEP (**Attachment 3**).

An historical EDR City Directory and historic aerial photographs were prepared for this site during the previous Phase I ESA (MGA, 2016). Refer to the EDR City Directory and historic aerial photography for specific details (**Attachment 3**).

In the late nineteenth century, companies, such as the Sanborn Company, began preparing maps of central business districts for use by fire insurance companies. These maps were updated periodically throughout the twentieth century. Fire insurance maps often indicate construction materials, specific property use, and the location of other features such as gasoline storage tanks. Please refer to the Certified Sanborn Map for specific details regarding the lack of coverage for the subject site (**Attachment 5**).

Information from these reports was used to develop the site history (further discussed in Section 4.4).

The University of Nevada Radon Education Program compiles short-term radon test results that were completed by Nevada homeowners from 1989 to present. The results were compiled for each county by zip code and a corresponding geographical information systems (GIS) map based on zip codes was designed by the University of Nevada Cooperative Extension and the Nevada Bureau of Mines and

Geology. The MyHazards interactive webmap was reviewed and the Radon Potential in the vicinity of the subject site appears to be 18.18% (UNR, 2017).

4.4 Historical Use Information on Property and Adjoining Properties

This section describes the historical land use of the subject site and adjoining properties compiled from several resources, including the City Directory, Historical Topo Map Report, and Satellite Imagery Data (Attachment 5).

The objective of consulting historical sources is to develop the history of the previous uses of the surrounding properties in order to help identify the likelihood of past uses having led to recognized environmental conditions in connection with the property. The historical uses of the subject site and properties in the immediate vicinity of the subject site are summarized below in **Table 4-5**. Reference source not found..

Table 4-5: Subject Site and Vicinity Historical Land Use Observations

Year	Subject Site	Vicinity	Source(s) of Information
1960	Main hospital structure is evident.	North of subject site apparent city streets, radio tower, and the Town of Tonopah. To the east Golden Mountain is labelled. South of subject site a Military Reservation, apparent fire hydrant, and Brock Mountain are labeled. To the northeast of subject site a Radio Tower, water, Brougher Mountain, and the Esmeralda/ Nye County line are labelled.	TP, Tonopah, 1960, 7.5 minute
1961	Main hospital structure is evident.	No significant change since TP, Tonopah, 1960, 7.5 minute.	TP, Tonopah, 1961, 15 minute
1974	Not discernible due to poor quality of visual resource.	Not discernible due to poor quality of visual resource.	Aerial Photo – 1” = 1000’
1974	No significant changes from 1961 topo map.	No significant change since, TP, Tonopah, 1960, 7.5 minute.	TP, Tonopah, 1974, 7.5 minute
1976	Not discernible due to poor quality of visual resource.	Not discernible due to poor quality of visual resource.	Aerial Photo – 1” = 1000’
1980	Structures visible on north portion of parcel.	Apparent city grid to northwest of subject site.	Aerial Photo – 1” = 1000’
1982	Additional detail of subject site depicted.	To the north, south, east, and west the addition of trailer parks have been noted.	TP, Tonopah, 1982, 7.5 minute
1984	Structures visible on north portion of parcel.	Apparent development of buildings to the south of subject site.	Aerial Photo – 1” = 500’

Year	Subject Site	Vicinity	Source(s) of Information
1992	Site listed as Hospital Nye General, Mental Health Center, Nevada Health Inspector, Nevada State Health Services, and Tonopah Mental Health Center.	820 – BF Goodrich and Goodyear D&D Tire and Michelin D&D Tire.	Cole Information Services
1994	Primary structures present in current configuration.	No significant change from 1984 aerial photo.	Aerial Photo – 1” = 500’
1995	Subject site listed as Health Inspector.	Residential properties listed.	Cole Information Services
1999	Not discernible due to poor quality of visual resource.	Not discernible due to poor quality of visual resource.	Aerial Photo – 1” = 750’
1999	Site listed as Nye Regional Medical Center Hospital, Nye Regional Medical Center Hospital Clinic, Southwest Vision Services Ronald Dutton, and Vasquez Beraldo, MD.	805 – Nevada State Government Offices Department of Transportation	Cole Information Services
2003	Subject site not listed.	Only residential properties listed.	Cole Information Services
2006	Additional support structures visible on north and west side of parcel.	Additional building structures to the northeast and east of property.	Aerial Photo – 1” = 500’
2008	Subject site not listed.	201 – United States Postal Service.	Cole Information Services
2010	Additional asphalt paving between structures.	No significant changes from EDR 2006.	Aerial Photo – 1” = 500’
2013	Nye Regional Medical Center: 825 Erie Main Street “Occupant Unknown”.	805 – State of Nevada Department of Transportation. 826 – Economy Inn	Cole Information Services
2014	No significant changes from 1982 topo map.	No significant change from 1982 topo map.	TP, Tonopah, 2014, 7.5 minute

In addition to the reference documents discussed above, BEC reviewed two reports previously prepared for NDEP by MGA. These reports included a Phase I Environmental Site Assessment dated July 22, 2016, and a Hazardous Building Materials Survey report dated May 31, 2017 (MGA, 2017). In the Phase I Environmental Site Assessment, McGinley identified two HRECs:

- In May 1995, Nye County abandoned a 500-gallon diesel tank associated with the biowaste storage building/incinerator on the subject property by filling the UST with sand. Nye County obtained two soil samples from either end of the UST for laboratory analysis. Laboratory analytical results reported both samples contained TPH concentrations below the 10 mg/kg detection limit. Based on this information, NDEP closed the case file on February 25, 1997.
- In 1999, Nye County abandoned a 10,000-gallon heating oil tank in place after collecting soil samples for laboratory analysis for TPH. The laboratory analytical results reported TPH concentration from both samples as 25 mg/kg, below the State Action Level of 100 mg/kg TPH. Based on the laboratory analytical data, NDEP closed the case file on February 3, 1999.

MGA identified one CREC for the site, as follows:

- After removal of a 750-gallon UST, two soil samples were collected from either end of the former UST location for laboratory analysis. Laboratory analytical results reported both samples exceeded the detection limit for TPH and one reported a TPH concentration of 176 mg/kg (above the State Action Level of 100 mg/kg). A request for administrative closure based on an A through K site evaluation in accordance with conditions outlined in NAC 459.9973, Sections 1(a) through 1(k). NDEP concurred with the request based on the site evaluation and closed the case file in February 1999. Based on the remaining TPH in soil at the subject site, MGA also considered this CREC to be a REC for the subject property.

The following additional REC was identified at the subject property:

- During the site visit conducted for the Phase I ESA, MGA suspected the presence of remnant diesel fuel piping associated with one of the previously abandoned USTs at the subject property. This suspicion was based on their observation of two possible diesel supply pipes protruding from the concrete floor within the generator shed and one suspected vertical vent pipe observed along the exterior wall of the generator shed adjacent to the main hospital building.

The Phase I ESA also reported evidence of asbestos-containing building materials (ACBM) in several areas of the main hospital building. Based on the identification of two RECs and evidence of ACBM in the main hospital building, MGA recommended additional investigation at the subject property.

In the Hazardous Building Materials Survey report dated May 31, 2017, ACBM was present in the following locations, based on bulk sample analytical results indicating asbestos content above 1%: the main hospital building interior, the main hospital building mezzanine, the main hospital building roof, the pump house exterior, and the clinic building interior. Lead-based paint (LBP) survey results reported lead concentrations above the Housing and Urban Development (HUD) action level of 1.0 mg/cm² in painted surfaces in the kitchen restroom, kitchen exit hallway, mechanical rooms, housekeeping, nursery, north hallway, x-ray waiting room, and the roof. The limited microbial assessment conducted as part of the Hazardous Building Materials Survey reported normal interior microbial concentrations and no visible mold growth at the time of the survey. Additional information regarding specific concentrations, observations, and recommendations are available and should be referenced directly from MGA's Hazardous Building Materials Survey Report.

5 SITE RECONNAISSANCE

The site reconnaissance was conducted to obtain information indicating the likelihood of identifying historical, recognized, and controlled environmental conditions in connection with the property and adjacent area. BEC performed the site reconnaissance on September 20, 2019, beginning at approximately 8:30 am. Eileen Christensen, Principal, was present for the site reconnaissance. The temperature was

approximately 45 degrees Fahrenheit with winds approximately five miles per hour according to the Tonopah monitoring station of the Desert Research Institute (DRI) Community Environmental Monitoring Program, 2019 (DRI Community Environmental Monitoring Program, 2019).

BEC performed a visual survey of the adjoining properties to the north, west, south, and east of the subject site in order to evaluate the types of businesses, structures, and any conditions of the neighboring properties that may pose an environmental risk to the subject site. Structures of particular note (i.e. exposed pipes, above ground storage tanks, etc.) were photographed and observations recorded in a field log.

Conditions of the subject site and adjoining properties were visually evaluated for potential RECs. Photos taken during the site reconnaissance are provided in **Attachment 6 – Site Reconnaissance Documentation**.

5.1 General Site Setting

The subject site is comprised of a 6.53-acre parcel with improvements (as observed on the site and described in detail in county assessor records) located at 825 South Main Street, Tonopah, Nevada, APN 008-261-56 with improvements discussed in section 2.1.

Features of adjoining and nearby properties are identified in the Area Reconnaissance Map (**Attachment 1, Figure 3**). Key observations made during the exterior portion of the site visit are depicted in the Site Reconnaissance Map (**Attachment 1, Figure 4**). The current use of adjoining properties to the north, east, south, and west, are described in **Table 2-1**.

5.2 Exterior Observations

BEC walked the perimeter of the subject site and noted conditions inconsistent with those expected for a professional/commercial development. The initial observations were conducted around the perimeter beginning at the main entrance to the facility, on the west side of US Highway 95. The subject site was visually inspected by walking around each of the main structures of the hospital complex. **Attachment 6, Exterior Photo 1** is a view of the CALNevada Towing facility and Economy Inn, located across US 95, on the north side of the subject site. An open stormwater channel was also located along the northern boundary of the subject property and is depicted in the foreground of this photograph. **Attachment 6, Exterior Photo 2** is a view of the front of the hospital building and its associated asphalt parking lot. During the site visit, the parking lot appeared to be in poor condition, with evidence of significant cracking, spalling, and potholes throughout the asphalt surface layer. The water and sanitary sewer access covers were observed during the site visit at the northwest corner of the subject property, however, the size (8"-12") was smaller than a standard sewer cover (**Attachment 6, Exterior Photo 3**). **Attachment 6, Exterior Photo 4** is a view of the records storage building, conex boxes, and portable generator structure located on the west side of the subject property and abutting the NDOT maintenance facility's eastern boundary. The contents of the conex boxes are unknown. There did not appear to be leaking or staining, therefore this was not considered to be a significant data gap. **Attachment 6, Exterior Photo 5** is a view facing west, toward the site's southern solar panel array, a propane tank farm with 10 vessels, and an office trailer and maintenance building in the background. **Attachment 6, Exterior Photo 6** is a view of the southern end of the parcel facing west, toward the ambulance building and former water pump shed building (on the right side of the photo). **Attachment 6, Exterior Photo 7** depicts the south side of the main hospital building with a diesel above-ground storage tank (AST) with concrete secondary containment, adjacent to the generator shed. Evidence of abandoned sub-surface piping was observed in the generator building. **Attachment 6, Exterior Photo 8** shows the current above-ground piping configuration between the diesel AST and the generator shed. **Attachment 6, Exterior Photo 9** is a view of a second solar panel array and an adjacent portable generator structure located southeast of the clinic

building. **Attachment 6, Exterior Photo 10** is a view of the clinic building located on the east side of the subject property.

5.3 Interior Observations

BEC walked through the interior of the subject site and noted any conditions that had the potential to be recognized environmental conditions.

The hospital building was accessed through the northeastern entrance, near the ambulance bay. After passing by a waiting room and associated restroom/changing room, BEC entered a “clean room” for sterilizing equipment and supplies. **Attachment 6, Interior Photo 1** depicts an autoclave located in the “clean room” that contained a sink. **Attachment 6, Interior Photo 2** depicts one of four sinks in the room, which comprised two areas – one area dedicated to receiving “soiled tools” and the other for sanitizing. Based on a review of the building schematics provided by Nye County, the sinks, drains, and other water disposal features were directed to a sanitary sewer associated with the property. In addition to approximately 25 patient rooms, there were rooms marked for Labor, Nursery, Operating, Cat Scan, Cardio Pulmonary, Day Room, Break Rooms, Doctor and Nurse Lounges, and bathrooms, all out-of-use and the majority observed to be empty or used as temporary storage. Numerous storage closets and cabinets were filled, or partially filled, with cleaning chemicals, such as that depicted in **Attachment 6, Interior Photos 3 and 4**, and other storage rooms were partially filled with medical supplies (examples provided in **Attachment 6, Interior Photos 5 and 6**). Floor drains were noted in multiple locations throughout the hospital, including in what appeared to be the former laundry room, electrical control room, janitorial closet, laboratory, and possibly the boiler room (see **Attachment 6, Interior Photos 7 through 12**). Floor staining consistent with that from petroleum hydrocarbons was observed in the boiler room and the generator shed (see **Attachment 6, Interior Photos 13 and 14**). Hazardous material storage included one steel 55-gallon drum marked as Propylene Glycol (**Attachment 6, Interior Photo 15**) and one unmarked 55-gallon poly drum, about two-thirds full, containing an unknown liquid located in the boiler room. Other smaller (5-gallons or less) containers appeared to contain various constituents including grease, oil, paint, adhesives, and solvents. Car-type batteries were observed to be recharging. An X-ray room was also observed, including what appeared to be imaging equipment (see **Attachment 6, Interior Photo 16**). Finally, signage on refrigerators and in other areas of the hospital indicated biohazardous waste was stored on the subject property. Signage at the boiler room warned of the presence of asbestos and the deterioration of the ceiling and vinyl floor tile in one of the hallways, and pipe wrapping (see **Attachment 6, Interior Photo 17**) discussed in MGA’s previous Phase I Environmental Site Assessment, indicated the asbestos had not yet been removed.

BEC entered the interior of the maintenance building and observed severe deterioration of the ceiling (see **Attachment 6, Interior Photo 18**) and storage of several discrete, containerized quantities of hazardous materials (paints, grease, oils, etc.) stored within the building (See **Attachment 6, Interior Photos 19 and 20**).

The clinic building was the one structure with active health-care activities observed during the site visit. Approximately half of the structure was empty, while the other half appeared to have been remodeled for use as a receiving lobby and nurses’ station, several clinic rooms for seeing patients, and several bathrooms. One area was observed to be used for heating water and another for use as an air-handling room, however, no hazardous materials aside from discrete (household-sized) cleaning chemical containers appeared to be stored in the building.

The ambulance building was not accessible during the site visit. However, based on discussions with Lorina Dellinger (Assistant Nye County Manager), the facility was about to be remodeled, so was not currently in use. The MGA Phase I Environmental Assessment report indicated the presence of floor drains and a potential sand/oil separator adjacent to the ambulance building.

6 FINDINGS, OPINIONS, AND CONCLUSIONS

The following is a summary of findings associated with the ESA performed for the subject site. The following items were noted:

- The Nye Regional Medical Center is on a 6.53-acre parcel at 825 South Main Street Tonopah, Nevada 89049.
- Based on a review of the historical documents, including Nye County Assessor, the property is owned by Nye County State of Nevada.
- An initial Phase I ESA was prepared for the subject site by McGinley and Associates (MGA) and dated July 22, 2016 (MGA, 2016). Where practicable, as much of the historic references and information from that report has been incorporated to this report either directly or by reference.
- The main structures on the subject parcel included:
 - The main hospital building, located in the central portion of the subject parcel, constructed in 1971, and 29,158 square feet (sq ft) in size.
 - A records storage building, located northwest of the hospital building, constructed in 1987, and approximately 2,880 sq ft in size.
 - Two metal conex boxes, located immediately south of the records storage building, constructed in 1987, and 320 sq ft in size.
 - One portable generator unit, located immediately south of the conex boxes and approximately 300 sq ft in size.
 - A liquid oxygen tank farm containing one bulk storage tank (approximately 16 ft high) and ten 4-ft cylinders, located southwest of the hospital building, constructed in 1995, and approximately 210 sq ft in size.
 - A maintenance building, located southeast of the liquid oxygen tank farm and south of the hospital building, constructed in 1989, and 1,581 sq ft in size.
 - A mobile home/office trailer located south of the liquid oxygen tank farm and southwest of the maintenance building, constructed in 1991, and approximately 720 sq ft in size.
 - A solar panel array, located south of and adjacent to the mobile home/office trailer, and approximately 8,125 sq ft in size.
 - A liquid propane gas cylinder tank farm containing 10 liquified petroleum gas cylinders, located north of the solar array and southeast of the maintenance building, and approximately 1,600 sq ft in size.
 - The ambulance building, located south of the hospital building and east of the liquid propane gas cylinder tank farm, constructed in 1996, and approximately 2,350 sq ft in size.
 - A biowaste storage building located south of the hospital building and north of the ambulance building, constructed in 2006, and approximately 256 sq ft in size.
 - A shed, formerly used for pumping water to the facility, located southeast of the hospital building and east of the biowaste storage building, and approximately 20 sq ft in size. No groundwater wells were observed on the subject parcel. Based on a review of Nevada Division of Water Resources' (NDWR) Well Log Database, no water wells were located in the vicinity of the subject site.
 - The clinic building, located east of the hospital building, constructed in 1983, and approximately 9,044 sq ft in size.
 - A solar panel array, located southeast of the clinic building, and approximately 1,350 sq ft in size.
- Based on reviews of topography maps for the area, the parcel ranges in elevation from approximately 6,140 to 6,160 ft above mean sea level. Based on site observations, the highest elevation of the parcel is along the southern boundary. The southernmost solar array, mobile

home/office structure, LPG tanks, and ambulance building are at the highest points on the parcel. The records storage building, conex boxes, mobile generator, hospital building, liquid oxygen tank farm, and clinic building, as well as the associated asphalt parking lot for these structures, are located at the lowest elevation on the parcel.

- The regulatory database report was purchased through Environmental Data Resources, Inc. (EDR) and the review of the report identified the following:
 - The regulatory database review identified the subject property in the State and tribal-equivalent CERCLIS database as a SHWS and in the State's registered UST list.
 - The regulatory database review identified one RCRA Small Quantity Generator site; one SEMS-Archive site; 8 state and tribal-equivalent CERCLIS database as a SHWS (including the subject site); two State registered UST sites (including the subject site); 3 Brownfield sites (excluding the subject site); and one former landfill/solid waste disposal site within their respective search radii from the subject site.
- Based on BEC's review of the EDR regulatory database report for the site and the previous Phase I ESA's findings, the following constitute HRECs for the site:
 - In May 1995, Nye County abandoned a 500-gallon diesel tank associated with the biowaste storage building/incinerator on the subject property by filling the UST with sand. Nye County obtained two soil samples from either end of the UST for laboratory analysis. Laboratory analytical results reported both samples contained TPH concentrations below the 10 milligram per kilogram (mg/kg) detection limit. Based on this information, NDEP closed the case file on February 25, 1997.
 - In 1999, Nye County abandoned a 10,000-gallon heating oil tank in place after collecting soil samples for laboratory analysis for TPH. The laboratory analytical results reported TPH concentration from both samples as 25 mg/kg, below the State Action Level of 100 mg/kg TPH. Based on the laboratory analytical data, NDEP closed the case file on February 3, 1999.

BEC has performed a Phase I ESA in conformance with the scope and limitations of ASTM E 1527-13 for the subject site located at 825 South Main Street, Tonopah, Nevada on APN 008-261-56. Any exceptions to, or deletions from, this practice are described in Section 1.3 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the subject site except the following:

- Based on BEC's review of the EDR regulatory database report for the site and the previous Phase I ESA's findings, the following constitutes a CREC for the subject site:
 - After removal of a 750-gallon UST, two soil samples were collected from either end of the former UST location for laboratory analysis. Laboratory analytical results reported both samples exceeded the detection limit for TPH and one reported a TPH concentration of 176 mg/kg (above the State Action Level of 100 mg/kg). A request for administrative closure based on an A through K site evaluation in accordance with conditions outlined in Nevada Administrative Code (NAC) 459.9973, Sections 1(a) through 1(k). NDEP concurred with the request based on the site evaluation and closed the case file in February 1999. Based on the remaining TPH in soil at the subject site, BEC (consistent with MGA's previous report) considers this CREC to be a REC for the subject property.
- Based on BEC's observations made during the site visit, BEC considers the following conditions to constitute RECs for the site:
 - During the site visit conducted for the Phase I ESA, BEC (consistent with MGA's findings from the earlier Phase I ESA) observed the presence of remnant diesel fuel piping associated with one of the previously abandoned USTs at the subject property. This suspicion was based on observation of two possible diesel supply pipes protruding from the concrete floor within the generator shed and one suspected vertical vent pipe

observed along the exterior wall of the generator shed adjacent to the main hospital building.

- During observations made throughout BEC's site visit and in MGA's Phase I ESA report, floor drains were noted in the laboratory, boiler room, and ambulance building. The active and historic use of hazardous materials in the vicinity of these drains was also noted in each of these areas. It should be noted that the use of silver bromide to develop x-ray films may be a contributing factor to heavy metals in floor drains and their associated plumbing traps. Additionally, MGA noted the possible existence of a sand/oil separator near the ambulance building but did not note a similar feature for the floor drains in the main hospital buildings. BEC considers the existence of plumbing traps and sand/oil separator structures to constitute a REC warranting investigation of these structures for petroleum products, heavy metals, and other hazardous materials.
- Based on the findings of the MGA Hazardous Building Materials report, BEC considered ACMs and LBP to be a BER for the subject site.

It is the opinion of BEC the identified conditions above warrant additional investigation.

7 PREPARER QUALIFICATIONS

The BEC Team members responsible for the development of this report are listed below and their qualifications are provided herein (**Attachment 7 – Environmental Professional Resumes and Certifications**). The following statements are required in accordance with 40 CFR 312.21(d), and Section 12.13 *Environmental Professional Statement*, of ASTM E-1527-13:

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professionals as defined in §312.10 of 40 CFR 312.

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



B. Eileen Christensen, CEM
Preparer

11/20/19
Date



Rachel O. Schlick, CEM
Reviewer

11/20/19
Date

Additionally, in accordance with the Nevada Revised Statutes 459.500, Section 1, a holder of a certificate who is responsible for service requiring certification shall ensure that each document relating to the service includes the following language:

I, Belva Eileen Christensen, hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state, and local statutes, regulations, and ordinances.



B. Eileen Christensen, CEM
Certified Environmental Manager
No. 1694
Expires: October 7, 2021

11/20/19
Date

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